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Mr. Hooton
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:21-cr-105-TLN
11)
Plaintiff,) **STIPULATION AND ORDER TO CONTINUE**
12) **STATUS CONFERENCE AND EXCLUDE TIME**
vs.)
13) Date: January 27, 2022
BRENT EDWARD HOOTON,) Time: 9:30 a.m.
14) Judge: Hon. Troy L. Nunley
Defendant.)
15 _____)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 Phillip A. Talbert, through Assistant United States Attorney Audrey Hemesath, counsel for
18 Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan
19 Baigmohammadi, counsel for Defendant Brent Edward Hooton, that the status hearing currently
20 set for January 27, 2022 at 9:30 be continued to April 28, 2022 at 9:30 a.m.

21 The parties specifically stipulate as follows:

- 22 1. By previous order, this matter was set for a status on January 27, 2022 at 9:30 a.m.
23 2. Mr. Hooton now moves to continue the status conference to April 28, 2022 at 9:30 a.m.
24 3. The government has discovered over 600 pages and various video and audio recordings
25 to the defense. The government has also made available to the defense the seized
26 electronic devices in this case for inspection.
27 4. The defense requires additional time to review the discovery; investigate and research
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possible defenses; research potential pretrial motions; consult with Mr. Hooton; explore potential resolutions to the case; and otherwise prepare for trial.

5. Defense counsel believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* U.S.C. § 3161(h)(7)(B)(iv).
6. The government does not object to the continuance.
7. The parties jointly request the Court to find that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Hooton in a speedy trial; and for the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), that the time period between January 27, 2022 and April 28, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) (Local Code T4).

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: January 20, 2022

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Hooton

Date: January 20, 2022

PHILLIP A. TALBERT
United States Attorney

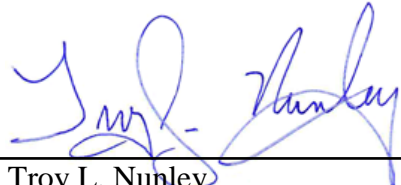
/s/ Audrey Hemesath
Audrey Hemesath
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: January 20, 2022



Troy L. Nunley
United States District Judge